

0013



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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TO: Daron Haddock, Permit Supervisor  
FROM: Wayne H. Western, Reclamation Engineer  
DATE: January 7, 1993 *WHW*  
RE: U.S. Fuel Company, Hiawatha Mine, ACT/007/011-DO 92, Folder #2,  
Carbon County, Utah

R645-301-500                      Engineering  
R645-301-512                      Certification

Permit Application Defect:

1. Exhibit V-13C had not been stamped and signed by a registered professional engineer.

Applicant's Response:

The Applicant has submitted 13 certified copies of Exhibit V-13C to the Division.

Analysis:

Thirteen certified copies of Exhibit V-13C have been submitted to the Division.

Deficiencies:

None

R645-301-513                      Compliance with MSHA and Regulations and Approvals

Permit Application Defect:

1. The names and MSHA identification numbers associated with the three slurry ponds must be listed in the text.
2. The ponds must be identified as pre- or post-SMCRA.

Applicant's Response:

The slurry ponds' names and MSHA identification numbers are listed on page 1 under R645-301-513.100.

The Applicant has stated that all the slurry ponds were constructed pre-SMCRA and therefore do not have to meet design standards. The ponds do meet the performance standards.

Analysis:

The Applicant has listed the slurry ponds' names and MSHA identification numbers in the text. The ponds were constructed prior to SMCRA and are not required to meet design standards.

Deficiencies:

None.

**R645-301-513.300    Underground Development Waste, Coal Processing Waste and Excess Spoil**

Permit Application Defect:

1. The Applicant will commit that the underground disposal of any waste or spoil will be done in accordance with a MSHA approved plan.

Applicant's Response:

The Applicant has made that commitment on page 2 under R645-301-513.300

Analysis:

The Applicant is in compliance.

Deficiencies:

None.

**R645-301-513.400            Refuse Piles**

Permit Application Defect:

1. The Applicant will identify by name and MSHA identification number the refuse piles in the MRP text.

Applicant's Response:

The Applicant has identified the refuse piles by name and MSHA identification number on page 2.

Analysis:

The Applicant is in compliance.

Deficiencies:

None.

**R645-301-513.500 Capping and Sealing of Mine Openings**

Permit Application Defect:

1. The Applicant will show those facilities that must meet SMCRA closure standards.

Applicant's Response:

Exhibit IV-5 in Chapter IV shows current and abandoned mine sites. Those facilities which must meet SMCRA closure standards are identified as "current" on this map.

Analysis:

The Applicant is in compliance.

Deficiencies:

None.

**R645-301-514.100 Excess Spoil**

Permit Application Defect:

1. The Applicant will commit not to generate any spoil or address the related R645-301-514.100 regulations.

Applicant's Response:

The Applicant has committed not to generate any spoil (see R645-301-514.100 on page 3.)

Analysis:

The Applicant has made the necessary commitments.

Deficiencies:

None.

**R645-301-521                      Operational Plan - General**

Permit Application Defect:

1. Maps and cross-sections must meet the requirements of R645-301-521.100 through R645-301-521.190. The surface maps will show all pre-SMCRA structures.
2. The Applicant shall meet the signs and marker requirements set forth in R645-301-521.100 through R645-301-521.270

Applicant's Response:

The Applicant has met the requirements of R645-301-521.100 through R645-301-521.900. Exhibit IV-5 shows the entire permitted area and all existing and proposed disturbed areas. This exhibit also shows all abandoned surface facilities and the date of their abandonment.

Signs and maker requirements have been met and are given on pages 6 through 11.

Analysis:

The Applicant has supplied the Division with the required maps and cross-sections. The Applicant has met the signs and markers requirements.

Defects:

None.

**R645-301-522                      Coal Recovery**

Permit Application Defect:

1. The Applicant is to include a copy of the resource recovery and protection plan in the MRP.

Applicant's Response:

Reference to the resource recovery and protection plan is made on page 12. A copy

of the plan is on file with the BLM Price office. Since it contains confidential information it has not been included in the MRP.

Analysis:

The Division no longer requires applicants to include a copy of the resource recovery and protection plan in the MRP. Reference to the plan is required. The Applicant has met the Division's requirements.

Deficiencies:

None.

**R645-301-523**

**Mining Methods**

Permit Application Defect:

1. The Applicant will discuss what changes in mining methods will occur due to production decreases.

Applicant's Response:

No changes in mining methods are anticipated due to production decreases.

Analysis:

The Applicant has clarified the information on mining methods.

Deficiencies:

None.

**R645-301-523**

**Blasting and Explosives**

Permit Application Defect:

1. The Applicant did not adequately address the blasting and explosives regulations.

Applicant's Response:

The Applicant has committed that no surface blasts will occur until after the Division has approved the Applicant's blasting plan.

Analysis:

The Applicant is in compliance.

Deficiencies:

None.

**R645-301-525                      Subsidence**

Permit Application Defects:

1. The Applicant will submit a map showing the extent of possible subsidence and the location of any nonrenewable resource.
2. The Applicant will submit geologic data and a model to support claims about subsidence.

Applicant's Response:

The Applicant has submitted a map showing the location of nonrenewable resources and the extent of possible subsidence. Geologic data and a model to support the claims are given in the hydrology chapter.

Analysis:

The subsidence map shows that subsidence can occur outside of the permitted area. The subsidence area that is not included in the permit area contains springs that could be effected by ground movement.

The subsidence control plan states that before any full extraction mining is conducted under perennial stream that the Applicant will contact the Division. The perennial streams are not marked on the subsidence maps.

Deficiencies:

1. The Applicant must either modify the mine plan or permit boundaries to insure that no areas containing springs subside unless they are in the permit area.
2. The Applicant needs to identify all perennial streams that could be effected by subsidence.

**R645-301-527                      Transportation Facilities**

Permit Application Defect:

1. Slope stability information on all road cuts must be shown in the text.

Applicant's Response:

All roads having steep road cut were constructed prior to SMCRA. The roads do not

have to meet design standard, but must comply with performance standards.

Analysis:

All the steep road cuts were constructed prior to SMCRA and are therefore exempt from the design standards.

Deficiencies:

None.

**R645-301-528.100 Coal Removal, Handling, Storage, Cleaning and Transportation Areas and Structures**

Permit Application Defect:

1. The Applicant was required to address this section.

Applicant's Response:

The Applicant has cross referenced the section where those facilities are discussed. (See mining methods and mine facilities.)

Analysis

The Applicant has addressed the regulations.

Deficiencies:

None

**R645-301-528.200 Overburden  
R645-301-528.310 Excess Spoil  
R645-301-528.310 Return of Coal Processing Waste to Abandoned Underground Mines**

Permit Application Defect:

1. The Applicant did not make a commitment in the MRP to comply with those regulations.

Applicant's Response:

The Applicant has committed to comply with those regulations.

Analysis:

The Applicant has addressed the regulations.

Deficiencies:

None.

**R645-301-528.330 Noncoal Waste**

Permit Application Defect:

1. The Applicant will address the disposal of noncoal waste.

Applicant's Response:

Several temporary storage sites for noncoal waste have been established on the site. Garbage, combustible material and other small items will be stored in metal dumpsters. The dumpsters are regularly transported to the Carbon County landfill.

Analysis:

Noncoal waste is stored and disposed of in an approved manor.

Deficiencies:

None.

**R645-301-529 Management of Mine Openings**

Permit Application Defect:

1. List the mine openings and their status with regards to SMCRA.

Applicant's Response:

Table V-8 on page 51 gives a listing of mines and mine openings and their status with regard to SMCRA.

Analysis:

The Applicant has supplied the Division with the required information.

Deficiencies:

None.

**R645-301-530**

**Operational Design Criteria and Plans**

Permit Application Defect:

1. The Applicant will address the regulations

Applicant's Proposal:

The Applicant has cross referenced those parts of the MRP that describe the operational design and plans.

Analysis:

The Applicant has met the requirements of this section.

Deficiencies:

None.

**R645-301-540**

**Reclamation Plan**

Permit Application Defect:

1. Show the permit area and all structures not subject to SMCRA regulations.
2. The Applicant will discuss the topsoil distribution and depth.

Applicant's Response:

Exhibit IV-5 shows the entire permitted area and all existing and proposed disturbed areas. This exhibit also shows all abandoned surface facilities and the dates of their abandonment.

U. S. Fuel Company has conducted test plot studies in consultation with OSM and DOGM and has demonstrated that a maximum of 16 inches of substitute topsoil material is adequate to reclaim the refuse sites in the permit area.

Analysis:

Exhibit IV-5 shows the permitted and disturbed areas. Abandoned facilities and dates of abandonment are also shown on the exhibit.

The 16 inches of substitute topsoil material should be considered a minimum instead of a maximum.

Deficiencies:

None.